

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LINDA MIGLIORI, FRANCIS J. FOX,  
RICHARD E. RICHARDS, KENNETH  
RINGER, and SERGIO RIVAS,

Plaintiffs,

and

ZACHARY COHEN,

Intervenor-Plaintiff,

v.

LEHIGH COUNTY BOARD OF  
ELECTIONS,

Defendants,

and

DAVID RITTER,

Intervenor-Defendant.

No. 5:22-cv-00397-JFL

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**CERTIFICATE OF NON-CONCURRENCE**

I, Stephen A. Loney, Jr., hereby certify that I sought concurrence of Intervenor-Plaintiff Zachary Cohen, Defendant Lehigh County Board of Elections, and Intervenor-Defendant David Ritter in the Motion for Summary Judgment filed by Plaintiffs, Linda Migliori et al., and that counsel for Intervenor-Plaintiff concurs in said Motion, but counsel for Defendant and counsel for Intervenor-Defendant do not concur in said Motion.

Dated: February 11, 2022

/s/ Stephen A. Loney, Jr.  
Stephen A. Loney, Jr. (No. 202535)  
ACLU OF PENNSYLVANIA

*Counsel for Plaintiffs*